

**U.S. District Court for the  
Eastern District of Missouri  
Eastern Division**

Maleeha Ahmad, *et al.*,  
Plaintiffs,

v.

City of St. Louis,  
Defendants.

Case No. 4:17-cv-2455-CDP

The Honorable Catherine D. Perry

**Nonparty National Lawyers Guild's Motion to Intervene**

Nonparty the National Lawyers Guild (NLG) hereby moves to intervene in the above-captioned matter, pursuant to Federal Rule of Civil Procedure 24(a)(2), for the limited purpose of representing NLG's legal interests in this matter, including the filing of motions to quash subpoenas issued by defendant City of St. Louis.

NLG is a bar association dedicated to progressivism and social change. NLG established its well-known Legal Observer Program in 1968. The Program deploys legal observers to First Amendment-protected demonstrations to document police engagement with the demonstrators, in anticipation of litigation arising from those interactions. To become a legal observer, someone must first undergo vetting and a

training. NLG legal observer trainings are proprietary material unique to this specific Program. And because they are developed by NLG attorneys in anticipation of litigation, they constitute confidential attorney work product. *See* Memorandum of Law in Support of Nonparty National Lawyers Guild's Motions to Quash Subpoenas against Keith Rose and Scott Kampas (filed concurrently with this motion).

Defendant City of St. Louis has subpoenaed NLG members Keith Rose and Scott Kampas, demanding production of LO training materials—which constitute NLG property. The subpoenas also demand that Rose and Kampas testify in a deposition, without specifying the deposition's scope or subject matter. NLG now moves to intervene in this matter in order to protect its legal interests by filing motions to quash defendant's subpoenas against Rose and Kampas.

In compliance with Local Rule 37 – 3.04(A), counsel for movant conferred with counsel for plaintiffs, Jessie Steffan, through a series of conversations over telephone and by email beginning approximately March 5, 2019. Counsel for plaintiffs has consented to this limited motion to intervene.

In compliance with Local Rule 37 – 3.04(A), counsel for movant conferred by telephone with counsel for defendant City of St. Louis, Robert Dierker, on March 29, 2019, at approximately 9:00 a.m. central standard time. Defendant's counsel has consented to this limited motion to intervene.

**Wherefore**, the National Lawyers Guild respectfully requests this Court issue an order granting this request for a limited intervention so NLG may represent its

legal interests in this matter, including the filing of motions to quash subpoenas seeking disclosure of NLG's protected, confidential training materials.

Respectfully submitted,

/s/ Margaret Ellinger-Locke  
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### **Certificate of Service**

I certify that on April 1, 2019, the foregoing was served electronically on all parties via CM/ECF.

/s/ Margaret Ellinger-Locke, 63802MO  
Counsel for the National Lawyers Guild